

FILED 13 DEC '22 16:47 USDC-ORP

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

3:22-cr- 430-HZ

**v.**

**INDICTMENT**

**ERIKA CHISTIE SALAS,**

**21 U.S.C. § 841(a)(1) and 841(b)(1)(A)**

**Defendant.**

**Forfeiture Allegation**

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Possession with the Intent to Distribute Cocaine)**  
**(21 U.S.C. § 841(a)(1) and 841(b)(1)(A))**

On or about November 22, 2022, within the District of Oregon, defendant **ERIKA CHISTIE SALAS** did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A)(ii).

**FORFEITURE ALLEGATION**  
**(Controlled Substance Offense)**

Upon conviction of the offense in Count 1, defendant **ERIKA CHISTIE SALAS** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violation and any  
**Indictment**

property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation.


Dated: December 13<sup>th</sup>, 2022.

A TRUE BILL.

  
OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT  
United States Attorney

  
SCOTT M. KERIN, OSB # 965128  
Assistant United States Attorney